

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 24, 2010

Name of company covered by this certification: GP Communications, LLC

Form 499 Filer ID: 826121

Name of signatory: David W. Robinson

Title of signatory: Co-Chief Executive Officer and General Counsel of managing member

I, David W. Robinson, certify that I am an officer of the managing member of the company named above and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R.§ 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company has no information of any processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed:



## ACCOMPANYING STATEMENT TO ANNUAL CPNI CERTIFICATION

February 24, 2010

GP Communications, LLC has not used customer proprietary network information ("CPNI") except as included in the 47 U.S.C. § 222(d) exceptions.

- a) The Company has not sought customer approval of the use of CPNI because CPNI is not used.
- b) The Company has trained all personnel with access to CPNI as to the identification of CPNI and when CPNI may be used and has an express disciplinary process in place for any improper use of CPNI.
- c) The Company has not used CPNI in any sales or marketing campaign.

No outbound sales and marketing campaign can be conducted without management approval and any such campaign would require supervisory review to assure compliance with the CPNI rules.